



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

December 1, 2008

Reply To
Attn Of: ETPA-088

Ref.: 03-008-NPS

Peter Dederich, Superintendent
San Juan Island National Historical Park
P.O. Box 429
Friday Harbor, WA 98250

Dear Mr. Dederich:

The U.S. Environmental Protection Agency (EPA) has reviewed the National Park Service's (NPS) final General Management Plan (GMP) and Environmental Impact Statement (EIS) for **San Juan Island National Historical Park** (CEQ No. 20080014) in San Juan County, WA. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we also evaluate the document's adequacy in meeting NEPA requirements.

The final EIS evaluates the impacts of a National Park Service (NPS) proposal to update a 1979 management plan at the park's two areas referred to as, English Camp and American Camp. The EIS describes and analyzes the potential impacts from the No Action Alternative (Alternative A) and two alternative actions (Alternatives B and C) for long-term operations and management of the park.

The Preferred Alternative (Alternative C) would broaden the scope of resource management and interpretation programs to emphasize the connections and interrelationships between the park's natural and cultural resources. Key elements of this alternative are the preservation of historic structures; restoration of the prairie; and expansion of park boundaries to enhance the NPS's interpretation of the area's history, allow for continuous protected coastline, and better coordinated management of lands for resource protection and low-impact public use. EPA had concerns with the draft EIS based on potential impacts to water resources and air quality. The final EIS resolves our concerns regarding air quality by including additional information on ambient air quality and a commitment that an equipment emissions mitigation plan would be used to reduce diesel particulate, carbon monoxide, hydrocarbons, and NOx associated with construction activities. The following is a discussion of our outstanding concerns with water quality.

In our draft EIS comments we recommended that the final EIS include information about State water quality standards, list any impaired waters, demonstrate that there will be no degradation of water quality, and we encouraged the use of Low Impact Development (LID)

techniques for stormwater management. The EIS states that implementation of Alternative C would result in long term benefits to coastal water resources by having the park staff engage more actively in the management of the intertidal zone, but in the short term there could be short term impacts due to construction activities. We support the parks long-term strategy to protect coastal waters and the EIS does a good job characterizing water resources for lagoons, bays, and groundwater. However, there is not a detailed characterization of streams in the park.

The final EIS does not include detailed information about the quality of surface water in the area, does not clearly state whether there were any 303(d) listed streams, does not identify specific drainages (ephemeral, intermittent, or perennial) on maps, nor are specific management actions clearly tied to protecting surface water in the park. Therefore, we continue to have concerns with the ability of the GMP to protect surface water resources. The EIS states that for English Camp a series of intermittent lakes and streams drain into Garrison Bay while two significant creeks and one small drainage flow into Westcott Bay and that a watershed has not been delineated for American Camp. The final EIS discusses run off potential generally and states that overall, the water quality in the region of the park is relatively high. We acknowledge that the Response to Comments states that the NPS is aware of permitting requirements including the Clean Water Act and that the NPS will coordinate with the Washington Department of Ecology as it develops and implements restoration plans for impaired waterbodies that affect park resources. The final EIS includes two additional desired conditions to reflect the NPS commitment to improving and maintaining water quality and one additional desired condition promoting the use of LID. We support the inclusion of additional desired conditions and that the NPS will coordinate with appropriate agencies to obtain permits. To support the goal of protecting water quality, we recommend that a watershed analysis be completed for American Camp prior to construction and that planned activities be evaluated based on the occurrence of surface water and wetlands. We also support the use of best management practices to avoid impacts to water quality.

The EIS states that wetlands were inventoried and mapped in 1998 and a total of 35 wetlands were identified. The EIS also states that a wetland delineation and protection measures would be applied during projects indicating that the past inventory is not a complete delineation. We support completing a wetland delineation in the park prior to implementing activities in the GMP and using the data to avoid wetlands and seeps and springs for construction activities.

Thank you for the opportunity to review this final EIS. If you have questions or comments concerning our review, please contact Lynne McWhorter at (206) 553-0205 or me at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit